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RAYMUNDO ESCOBAR

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:25-CR-15-TLN-1
11 Plaintiff,)
12 vs.) **STIPULATION AND ORDER TO CONTINUE**
13 RAYMUNDO ESCOBAR,) **STATUS CONFERENCE AND EXCLUDE TIME**
14 Defendant.) Date: February 6, 2025
Time: 9:30 A.M.
Judge: Hon. Troy L. Nunley, Chief District Judge
15)

16 IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney
17 Michele Beckwith, through Assistant United States Attorney Emily Sauvageau, counsel for
18 Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Christina
19 Sinha, counsel for Mr. Escobar, that the status conference, currently set for February 06, 2025,
20 may be continued to April 10, 2025, at 9:30 a.m., with time between the dates excluded, as detailed
21 below.

22 The parties specifically stipulate as follows:

- 23 1. The indictment in this case was filed on January 23, 2025. Dkt. 13.
- 24 2. The government has relayed that there are are several related cases to the instant
25 matter.
- 26 3. Undersigned defense counsel represents that she requires additional time to
27 investigate this case, conduct legal research, consult with her client, and otherwise
28 prepare for trial. Additionally, the parties are negotiating issues related to

discovery. Undersigned defense counsel believes that failure to grant the requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

4. The government does not object to the continuance.

5. All time has been excluded through and including February 06, 2025. *See* 18 U.S.C. § 3161(c)(1); *see also* dkt. 13, 15.

6. The parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Escobar in a speedy trial, and respectfully request the Court so to find. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (the Speedy Trial Act), the parties request that the time period between February 06, 2025 and April 10, 2025 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Escobar in a speedy trial.

The parties therefore respectfully request this Court to adopt the parties' stipulation in its entirety as its Order.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: January 30, 2025

/s/ Christina Sinha
CHRISTINA SINHA
Assistant Federal Defender
Attorneys for Defendant
RAYMUNDO ESCOBAR

Date: January 30, 2025

MICHELE BECKWITH
Acting United States Attorney


/s/ Emily Sauvageau
EMILY SAUVAGEAU
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: January 30, 2025



Troy L. Nunley
Chief United States District Judge